



in Chicago, IL which makes the two parties' citizens of different states and the amount *in controversy* exceeds \$75,000. Specifically, Dora L. Adkins resides in Fairfax County with a mailing address of P.O. Box 3825, Merrifield, VA 22116 and the Defendant, Starbucks Corporation's Principal Office is located at 150 N Riverside Plz, Chicago, IL, 60606 - 1598, USA. (EXHIBIT #1: See, Copy of Business Entity Details for Hyatt Corporation, Proof of Diversity). The Diversity of citizenship between the Plaintiff, Dora L. Adkins and the Defendant, Hyatt Corporation is completely different; as well as the amount *in controversy* is for \$350,000 Dollars and this Honorable Court holds jurisdiction over the Complaint.

Plaintiff is asking for in Count #1: Breach of Contract – Two-Hundred Million Dollars; Count #2: Intentional Infliction of Emotional Distress – Two Hundred Million Dollars; and a Claim for Punitive Damages – Two-Hundred Million Dollars. The *in-controversy* amount for Punitive Damages is \$350,000. As a matter of law, Plaintiff established she has suffered an extreme & debilitating injury of emotional distress damages that satisfy the \$75,000 amount *in controversy* limit. Virginia cap on punitive damages. ... Virginia statute § 8.01-38.1 places a cap of \$350,000 on punitive damages courts may award to punish wrongdoers. Plaintiff will use the Virginia cap on punitive damages to meet the \$75,000 requirement for the amount *in controversy* limit.

**INTRODUCTION TO PRIMA FACIE CASE:**

1. The Plaintiff entered into a Contract with Defendant, Hyatt Corporation, owner and operator of the Hyatt Regency Reston Hotel located in Reston Virginia which started on August 18, 2020. The Plaintiff reserved and paid for a Guest's Room by using a Debit Card at the Front Desk of the Hyatt Regency Reston Hotel located in Reston, VA. (EXHIBIT #2: See, Copy of Reservations made from August 18, 2020 through Present, at the Hyatt Regency Reston Hotel):

**PRIMA FACIE CASE:**

**FACTS OF THE COMPLAINT:**

2. During a consecutive stay starting on August 18, 2020 through Present, the Plaintiff suffered a physical injury of severe and debilitating Head and/or Brain injury from chemical poisoning that was [allegedly](#) sprayed inside Guest Room #1505 November 10, 2020 [and an offensive smell on December 3, 2020](#). Plaintiff suffered another physical injury of severe and debilitating Head and/or Brain injury that lasted from December 4, 2020 through December 5, 2020. On December 5, 2020, Plaintiff went for a consultation with a CVS Pharmacist, Rich Anderson who conferred that inhaling a chemical poisoning and/or a chemical substance will cause head pain that cannot be cured with any medicine and suggested drinking lots of water and bed rest. The pain in Plaintiff's head was so severe that Plaintiff purchased Excedrin for Tension from CVS. Plaintiff



previously experienced loss of life after an ER Physician administered a shot in Plaintiff thigh for Chemical Poisoning. (EMAIL #4: See, Copy of Email Plaintiff Sent to Self-Regarding a Very Offensive Smell Coming from a Nearby Guest Room to #1505; EXHIBIT #4: See, Copy of Receipt for Excedrin for Tension; and the Name of CVS Pharmacist who Plaintiff Consulted with Regarding the Head Pain on December 5, 2020)). Plaintiff MUST not insist on reporting the problem to the Tyson Warren, GM for Hyatt Regency Hotel because Plaintiff will be without a place to stay.

3. Plaintiff checked into the Hilton Hotel located in Old Town Alexandria, VA on Saturday, December 5, 2020 to a Guest Room full of fumes. Plaintiff stayed in Guest Room #726 and demanded another Guest Room on Sunday, December 6, 2020 through Jarred, Front Desk Manager for Hilton and explained to Jarred that Plaintiff was at the Hilton because of being extremely sick from chemicals in another Hotel. Jarred indicated he was required to make a Report and block Guest Room #726 off. (EXHIBIT #5: See, Copy of Reservations made on December 5, 2020, at the Hilton located in Old Town Alexandria; EMAIL #5: See, Copy of Email Plaintiff Sent to Self-Regarding the Fumes in Guest Room #726; EMAIL #6: See, Copy of Email Plaintiff Sent to GM for Hilton and a Second Email to Self-Regarding Plaintiff's Request for Reward Points Redemption Because of Fumes Inside a Purchased Guest Room at the Hilton))). Plaintiff MUST not insist on

reporting the problem to the John O'Sullivan, GM for Hilton because Plaintiff will be without a place to stay.

4. The physical injury of a Brain Injury was allegedly caused by employees for Hyatt Regency Reston Hotel located in Reston, VA. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Sprayed Inside Guest Room #1505, Dated, November 11, 2020).

**EMAIL TO SELF REGARDING CHEMICAL POISONING  
SPRAYED INSIDE GUEST ROOM #1505**

From: doraadkins7@aol.com

To: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Date: Wed, Nov 11, 2020 8:17 am

**EMAIL TO SELF REGARDING CHEMICAL POISONING  
SPRAYED INSIDE GUEST ROOM #1505**

November 11, 2020

On November 10, 2020, after I returned from about 2-Hours of being out of Guest Room #1505 A CHEMICAL POISOING WAS SPRAYED INSIDE GUEST ROOM #1505.I became IMMEDIATELY GOT SICK with migraine headache, nausea and overall sickness. Something being sprayed inside Guest Room #1505 started on **Thursday, November 5, 2020** and I reported the incident to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston VA on Friday, November 6, 2020 when there was a made-up reason to enter Guest Room #1505 per a Notice received from Tyson Warren, General Manager on November 5, 2020. Guest Room #1505 filled the air with the spayed substance.



WHEN WILL IT STOP! WHEN WILL IT **STOP!**

If I leave the Hyatt Regency Hotel, located in Reston VA, WHERE WILL I GO IN THIS COVID-A9 PANDEMIC!! WITH NO FUNDS TO DO ANYTHING INCLUDING EATING!!!

Guests have been switched in and out of the Guest Room directly beside Guest Room #1505 to prevent detection of where the CHEMICAL POISONING IS COMING FROM. The Housekeeper is called to clean the Guest Room to prevent detection of where the CHEMICAL POISONING IS COMING FROM.

Sincerely,

Dora Adkins

EMAIL TO SELF REGARDING A VERY OFFENSIVE SMELL COMING FROM A NEARBY GUEST ROOM TO INSIDE GUEST ROOM #1505

From: doraadkins7@aol.com  
To: DoraAdkins7@aol.com <DoraAdkins7@aol.com>  
Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>  
Date: Sat, Dec 5, 2020 11:18 pm

**EMAIL TO SELF REGARDING A VERY OFFENSIVE SMELL  
COMING FROM A NEARBY GUEST ROOM TO INSIDE  
GUEST ROOM #1505**

December 5, 2020

On Thursday, December 3, 2020, at approximately 8:30 p.m. and/or after I had gone to bed I heard Guests arriving nearby to Guest Room #1505. At the exact same time a very offensive smell got inside Guest Room #1505 as if it had been sprayed inside Guest Room #1505. It was very offensive. I awaken with a headache and/or head pain which was what I thought, but it lasted until Saturday, December 5, 2020. The Housekeeper came early on Friday, December 4, 2020 to clean the Guest Room directly beside Guest Room #1505 but the offensive smell was left behind as though she had not cleaned the Guest Room. To protect my Health, I try not to go outside of Guest

Room #1505 while other surrounding Guest Rooms are opened and cleaned. HOW COULD THAT SMELL COMING OUT OF THAT GUEST ROOM NOT BE CLEANED BY THE HOUSEKEEPER AND/OR REPORTED TO MANAGEMENT. BECAUSE DIRECTLY AFTER THE GUEST ROOM HAD BEEN CLEANED BY THE HOUSEKEEPER THE SMELL REMAINED EVEN INTO THE HALLWAY.

About 10-15 minutes after the Guest Room was cleaned by the Housekeeper I went out to take out used linens from Guest Room #1505 and get clean ones and a different Housekeeper was cleaning a nearby Guest Room and I asked her if she smelled the offensive smell which she claimed not to smell anything.

On Friday, December 4, 2020, I was away from the Hyatt Regency Hotel for approximately 4-5 hours; no sooner than I arrived back the offensive smell invaded Guest Room #1505. I couldn't sleep for the head pain I started suffering and/or worsening from Thursday, December 3, 2020. When I left the Hyatt Regency Hotel using the steps; I heard someone coming from the 15th floor and I immediately left the stairwells and used the elevator in FEAR Someone was following me from that VERY OFFENSIVE GUEST ROOM.

On Saturday, December 5, 2020, I left the Hyatt Regency Hotel in an attempt to figure out what I should do. I went to CVS located in Annandale, VA and asked through a consultation with a CVS pharmacist what I should take for an unknown substance causing head pain. The CVS pharmacist recommended drinking lots of water and bed rest because he stated no medicine would relieve head pain caused by inhaling a substance.

I LEFT THE HYATT REGENCY HOTEL ON SATURDAY, DECEMBER 5, 2020 LOCATED IN RESTON, VA AND CHECKED INTO THE HILTON HOTEL LOCATED IN OLD TOWN ALEXANDRIA, VA. AS I WAS GETTING MY THINGS THAT I NEEDED FROM GUEST ROOM #1505 THE SMELL CAME BACK INSIDE GUEST ROOM #1505.



Sincerely,

Dora Adkins

5. The Plaintiff also sent [Emails](#) to Self-Regarding another instance of something being sprayed inside Guest Room #1505 while Plaintiff was asleep on Thursday, November 5, 2020 and reported the incident to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA on Friday, November 6, 2020; and the need to make a repair in the shower of Guest Room #1505 and a required upgrading of Hyatt Regency Systems received underneath the door of Guest Room #1505 on November 5, 2020. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Sprayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #2: See, Other Emails Sent to Self-Regarding the Something Being Sprayed Inside Guest Room #1505, Dated, November 6, 2020; EXHIBIT #3: See, Notice Received from Tyson Warren, General Manager for Hyatt Regency Reston Hotel, Dated, November 5, 2020))).

EMAIL TO SELF REGARDING STAY AT HYATT REGENCY HOTEL  
LOCATED IN RESTON, VA

From: [doraadkins7@aol.com](mailto:doraadkins7@aol.com)

To: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Cc: DoraAdkins7@aol.com <DoraAdkins7@aol.com>

Date: Fri, Nov 6, 2020 12:37 pm

**EMAIL TO SELF REGARDING STAY AT HYATT REGENCY  
HOTEL LOCATED IN RESTON, VA**

November 6, 2020



On Thursday, October 29, 2020, Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA knocked on Guest Room #1505 and informed me that it was reported by other Guests that the water inside the shower in their Guest Room was HOT.

On October 29, 2020, I reported to Mr. Brinson, that the water inside Guest Room #1505 had been extremely HOT since the start of my stay in August 2020 and that there had not been any COLD water and that my skin turned red from the extreme HOT water. I also shared that extremely HOT water was not good for the skin and that my skin had suffered red rashes on it. Mr. Brinson stated that he came by because he wanted to have an engineer take a look at the device in the shower of Guest Room #1505 to see if it needed replacing. I shared that as of Thursday, October 29, 2020 the water in the shower had not been Hot but Cold with an adjustable temperature had returned in the pass 3-days and that I would call him if the ALL HOT water in Guest Room #105 returned.

On Thursday, November 5, 2020, I received a Notice from Hyatt Regency Hotel General Manager, Tyson Warren that access to Guest Room #1505 was needed to "upgrade our systems." I telephoned the Front Desk on Thursday, November 5, 2020 and requested an appointment through Desiree, Front Desk Agent for 9:00 a.m. on Friday, November 6, 2020. On November 6, 2020, I also telephoned Mr. Brinson to ensure he was aware of the 9:00 a.m. appointment. He stated that the Notice did not go into details, but access was needed to install a device on the TV or Desk in the Guest Room for Security for the Housekeepers in case there was an emergency. WHY DIDN'T MR. BRINSON KNOW WHETHER IT WAS THE TV OR THE DESK?

On November 6, 2020, I telephoned back to Mr. Brinson to inform him that for Security purposes, I **should not** be inside Guest Room #1505 for the 5-minute upgrade because my identity would be revealed to the Contractors. He offered a nearby Guest Room #1506 which was directly across from Guest Room #1505; and I did not see ANYTHING OCCUR except the person looking around inside the Guest Room. As well as BECAUSE OF COVID-19 and that the upgrade was causing me a lot of problems because I do not want anything touched inside Guest Room #1505. Mr. Brinson ensured me

that nothing would be touched. Mr. Brinson MUST have forgotten my request within minutes because instead of providing me the Guest Room before the contractors came, HE CAME with two CONTRACTORS and addressed me by my first name "Dora." Mr. Brinson COULD SEE I was visibly upset by his action without me explaining and asked the two contractors to wait in the hallway before the elevators but the two contractors still saw my face and was looking at me as though they NEVER seen a person before.

The whole process was very upsetting because I had to clean behind the two; Mr. Brinson and the Contractor who entered Guest Room #1505 with wearing coverings of their shoes in a 4-STAR Hotel, the Hyatt Regency.

I also questioned twice if the one person who entered Guest Room #1505 was also staying in Guest Room #1504 and/or directly beside Guest Room #1505 because I reported to Mr. Brinson that I was awakened with a smell that got inside Guest Room #1505 at approximately 10:00 p.m. on Thursday, November 5, 2020. Mr. Brinson had stated that the CONTRACTORS were staying at the Hotel and that the upgrade had been going on earlier in the week. Mr. Brinson asked if the smell came from the next Guest Room directly beside Guest Room #1505 and I stated I did not know.

I also reported to Mr. Brinson whether or not there were gold bars in the Guest Rooms near Guest Room #1505 because the Guest Rooms had Guest in and out of the Guest Rooms as if there were NO OTHER Guest Rooms available in the entire Hotel. I stated that the Hotel is not sold out because I leave the Hotel EVERY DAY and can see that the Hotel is not SOLD out. Mr. Brinson seen to be aware that there is a 24-Hour Guideline because of COVID-19 restrictions and stated he would check with the Front Desk.

**THE WHOLE NEED TO GET INSIDE GUEST ROOM #1505 IS UNNEEVING AND VERY-UPSETTING BECAUSE I DON'T BELIEVE THE NEED.**

**The protocol to have an outside CONTRACTOR INSIDE Guest Room #1505 while being occupied is IMPROPER and a HUGE RISK; EVEN FOR 5-MINUTES. IT APPEARS THAT THE FIRST ATTEMPT DID'T WORK BECAUSE THE HOT**

**WATER CORRECTED ITSELF IN THE SHOWER OF GUEST ROOM #1505 AND MR. BRINSON ALSO STATED THAT THE PROBLEM WAS IN GUEST ROOM #1405. WHY DIDN'T MR. BRINSON CHECK GUEST ROOM #1405 BEFORE DISTURBING ME ON THURSDAY, OCTOBER 29, 2020.**

Sincerely,

Dora Adkins

**COUNT #1: ELEMENTS OF BREACH OF CONTRACT & FACTS TO SUPPORT A CAUSE OF ACTION FOR BREACH OF CONTRACT:**  
**ELEMENTS OF BREACH OF CONTRACT:**

6. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

7. The elements of breach of contract include the following: *Brown v.*

*Harms*, 251 Va. 301, 306, 467 S.E.2d 805, 807 (Va. 1996) (“the essential elements of a cause of action for breach of contract are: (1) a legal obligation of a defendant to the plaintiff, (2) a violation or breach of that right or duty, and (3) a consequential injury or damage to the plaintiff.”) (internal quotations omitted)

Retrieved on November 17, 2020 from <http://www.nylitguide.com/survey-50-states-breach-contract-claim/>

(1) The existence of a valid contract:

“a written or spoken agreement, especially one concerning employment, sales, or tenancy, that is intended to be enforceable by law.”



**FACTS TO SUPPORT A CAUSE OF ACTION FOR BREACH OF CONTRACT:**

7. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

8. The Plaintiff is staying at the Defendant, Hyatt Corporation, Hyatt Regency Reston Hotel from August 18, 2020 through Present who entered into Contract with Plaintiff when Plaintiff paid the room rate in exchange for a Guest's Room. 2) Performance or tendered performance by the Plaintiff: The Plaintiff performed her duty by paying approximately \$13,000.00 for the Guest's Room either before or shortly after using Guest's Room #1505.

9. "A breach of contract occurs when a party fails to perform an act that it has expressly or impliedly promised to perform." Defendant, Hyatt Corporation, failed to sell the Plaintiff a Guest's Room in which she paid for; free of chemicals poisoning and/or an offensive smell and/or an unknown substance that has allegedly occurred three-times.

10. The Defendant's Business of selling Guest's Rooms for a daily rate is expressly or implied promise that the Plaintiff as a "Guest" will go without incident if Plaintiff pays on time and/or upon an agreed upon date to live in a Hotel's Guest Room.

11. The Plaintiff did not bargain with the Defendant, Hyatt Corporation,

to cause her severe and debilitating brain injury; if not death, by attempted premeditated murder of spraying a chemical poisoning [and/or an unknown substance](#) directly inside Guest Room #1505.

12. The Defendant, Hyatt Corporation, through a Contract with the Plaintiff had a legal obligation to the Plaintiff to ensure her paid-for-room would be free of chemical poisoning [and/or an unknown substance](#) and to perform any investigation and/or changes requires when Plaintiff reported that something was sprayed into Guest Room #1505 on November 5, 2020, at approximately 10:00 p.m.

13. The Defendant, Hyatt Corporation, violated or breached that right or duty when it failed without any fault of Plaintiff to provide a Guest's Room as promised in the contract and caused the Plaintiff to become seriously physically injured with severe debilitating Head and/or Brian injury which caused Plaintiff rector bleeding to get rid of severe debilitating Head and/or Brian injury and AFTER Plaintiff discovered NO MEDICINE CAN RID the pain of a Brain Injury caused from chemical poisoning [and/or an unknown substance](#).

14. Upon the Guest's (who was Dora L. Adkins) request for reservation, a hotel (Hyatt Regency Reston Hotel) accommodation Contract comes into existence upon the Hotel's corresponding confirmation of the reservation that took place on August 18, 2020. Contractual Partners are the Hotel (Hyatt Regency Reston Hotel)

and the Guest (Dora L. Adkins). The Hotel is obliged to have the booked rooms available according to the General Terms and to render the services agreed. The Guest is obliged to pay the prices applying to or agreed. On for provision of accommodation and additional services he/she has used.

**COUNT #2: ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:**

**ELEMENTS FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:**

- Extreme or outrageous conduct that
- Intentionally or recklessly causes
- Severe emotional distress (and possible also bodily harm)

**FACTS TO SUPPORT INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS:**

**Extreme and Outrageous Conduct:**

15. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

16. Defendant, Hyatt Corporation alleged behavior constitutes extreme and outrageous conduct when it allegedly intentionally and recklessly caused the Plaintiff to suffer a severe and debilitating Head and/or Brian injury from alleged chemical poisoning [and/or an unknown substance](#) being sprayed directly inside Guest Room #1505. The pain Plaintiff suffered on Tuesday, November 10, 2020, from inhaling a chemical poisoning most likely carbon tetrachloride (a sweet smelling poisoning) [and/or an unknown substance](#) attacked Plaintiff's brain cells and caused a severe brain injury... (EMAIL #1: See, Email Sent to Self-Regarding



the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020;

EMAIL #3: *See*, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

Intent/Recklessness:

17. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

18. In addition to acting in an extreme and outrageous manner, Defendant, Hyatt Corporation acted with intent or recklessness because Hyatt Corporation allegedly targeted the Plaintiff when Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA knocked on the Guest Room door of #1505 and stated that reports by other Guests had been made that the Hot water was extremely Hot. (EMAIL #1: *See*, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505; EMAIL #3: *See*, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

Severe Emotional Distress:

19. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

20. In the Plaintiff's claim for Intentional Infliction, the Plaintiff's Emotional Distress in response to extreme and outrageous behavior reached a "severe" level. The Plaintiff can prove an injury that the Emotional Distress she experienced reached a sufficient level of severity, which justifies an award for

Intentional Infliction. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

21. The intensity and duration of the emotional distress also contribute to Plaintiff's severity, in that, she become bed-ridden and/or out of commission when chemical poisoning make contact with Plaintiff's body. (EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020; EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020)).

**CLAIM: ELEMENTS FOR PUNITIVE DAMAGES AND FACTS TO SUPPORT PUNITIVE DAMAGES:**

**ELEMENTS FOR PUNITIVE DAMAGES:**

22. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

23. Punitive Damages may only be awarded where there is misconduct or actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of others. *Giant of Virginia v. Pigg*, 207 Va. 679, 685-86 (1967)."

**FACTS TO SUPPORT PUNITIVE DAMAGES:**

24. Plaintiff realleges paragraphs 1 through 5 as though fully set forth herein.

25. The Cause of Action for this lawsuit against Hyatt, Corporation is a

Breach of Contract caused by the underlying torts of Intentional Infliction of Emotional Distress and a Claim for Punitive Damages. The Defendant's misconduct or actual malice, or such recklessness or negligence as to evince a conscious disregard of the rights of others caused the Plaintiff to come into direct contact with chemicals poisoning sprayed inside Guest #1505 Room and/or an unknown substance while occupied by the Plaintiff. The actions by the Defendant, Hyatt Corporation are premeditated murder because the Defendant, Hyatt Regency Reston Hotel was fully aware of Plaintiff's allergic reactions especially to chemicals and furthermore chemical poisoning and/or an unknown substances have no place inside a Guest's Room. The actions by the tortfeasors were malicious.

26. The Defendant, Hyatt Corporation, misconduct, or actual malice or recklessness or negligence evinced a conscious disregard of the rights of the Plaintiff when employees at the Front Desk and/or management for Hyatt Regency Reston Hotel are the ONLY individuals with knowledge that Plaintiff is in Guest Room #1505 because Plaintiff have not had ANY Guests and/or visitors inside Guest Room #1505. Allegedly, other Guests were not targeted through viscous harmful and unlawful actions directed against the Plaintiff; otherwise, there would be no Guests at the Defendant's Hotel.

27. The Defendant, Hyatt Corporation misconduct or actual malice or



recklessness forced the Plaintiff to be on constant guard for safety and the protection of her life; and prevents relaxation one could have through proper services at a Hotel.

28. Plaintiff's damages consist of a severe debilitating excruciating Head and/or Brain injury to Plaintiff's knowledge, while there are allegedly permanent injuries to Plaintiff's body.

29. Plaintiff should recover exemplary or punitive damages because the Plaintiff has shown in this Complaint that the willful and wanton acts were taken on a dry run on Thursday, November 5, 2020 when a non-chemical substance was sprayed inside Guest Room #1505 and no actions were taken by Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston, VA when Plaintiff reported the problem to Mr. Brinson on Friday, November 6, 2020. On November 10, 2020 and on December 3, 2020 chemical poisoning and/or an unknown substance got inside Guest Room #1505.

#### **SUMMARY:**

30. The Plaintiff was subjected to actual malice, or such recklessness or negligence by the Defendant, Hyatt Corporation as to evince a conscious disregard of the rights of other intentional harmful and unlawful actions. Plaintiff inhaled a chemical poisoning most likely carbon tetrachloride (a sweet-smelling poisoning) and/or an unknown chemical poisoning that attacked Plaintiff's brain cells and

caused a brain injury. "The primary effects of carbon tetrachloride in humans are on the liver, kidneys, and central nervous system (CNS). Human symptoms of acute (short-term) inhalation and oral exposures to carbon tetrachloride include headache, weakness, lethargy, nausea, and vomiting."

31. WHEREFORE, this Plaintiff claims SIX-HUNDRED MILLION DOLLARS and whatever else this Honorable Court deems appropriate.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Dora L. Adkins". The signature is fluid and cursive, with the first name "Dora" being the most prominent.

Dora L. Adkins, *pro se*

EMAIL #3:

**Fwd: EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INSIDE GUEST ROOM #1505 AT THE HYATT REGENCY HOTEL LOCATED IN RESTON, VA**

**From:** [doraadkins7@aol.com](mailto:doraadkins7@aol.com)

**To:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>

**Cc:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>

**Date:** Sun, Nov 15, 2020 1:38 pm

**CHEMICAL POISONING SMELL SPRAYED INSIDE GUEST ROOM #1505 HAS A SWEET DEADLY SMELL!!!**

November 15, 2020

The pain I suffered on Wednesday, November 10, 2020, from inhaling a chemical poisoning most likely carbon tetrachloride (a sweet

smelling poisoning) attacked my brain cells and caused a brain injury because the pain have been suffered by me before and CANNOT be eased by taking medicine prescribed for a Migraine Headache. I realized on Saturday, November 14, 2020, that the debilitating and extreme pain I suffered on Wednesday, November 10, 2020 was a BRAIN INJURY.

I RESEARCHED A SWEET-SMELLING POISONING AND CARBON TETRACHLORIDE CAME UP.

**“The primary effects of carbon tetrachloride in humans are on the liver, kidneys, and central nervous system (CNS). Human symptoms of acute (short-term) inhalation and oral exposures to carbon tetrachloride include headache, weakness, lethargy, nausea, and vomiting.”**

I reported the first smell of something being sprayed inside Guest Room #1505 to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston VA on Friday, November 6, 2020, but have not reported the incident to Tyson Warren, General Manager Hyatt Regency Hotel, located in Reston VA in fear of having NO PLACE TO STAY.

It happened before whereby a chemical poisoning most likely carbon tetrachloride (a sweet-smelling poisoning) was sprayed into my nearby surroundings in the following cases:

- 1) Hallmark Condominium
- 2) Hallmark Condominium
- 3) Hallmark Condominium
- 4) Hallmark Condominium
- 5) Hallmark Condominium

**NOTE:** I was seen by an ER physician who treated me for a Migraine Headache for the 5 Brain Injuries in Numbers 1-5, which I now KNOW from November 10, 2020 chemical poisoning on the Brain counteracts with any Migraine headache medicine.



- 6) Embassy Suites Hotel
- 7) Renaissance Hotel
- 8) Hilton Garden Inn Woodbridge, VA
- 9) Hyatt Regency
- 10) Hilton Alexandria Mark Center

The above list which may be incomplete would be when Plaintiff came in direct contact with a sweet-smelling poisoning most likely carbon tetrachloride and/or fumes-like substances and/or an unknown chemical poisoning while living in my own condominium or living in a Hotel.” (THIS WAS AN EMAIL THAT PLAINTIFF AMENDED)

Sincerely,

Dora Adkins

-----Original Message-----

From: [doraadkins7@aol.com](mailto:doraadkins7@aol.com)

To: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>

Cc: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>

Sent: Thu, Nov 12, 2020 6:45 pm

Subject: Fwd: EMAIL TO SELF REGARDING CHEMICAL POISONING SPRAYED INSIDE GUEST ROOM #1505 AT THE HYATT REGENCY HOTEL LOCATED IN RESTON, VA

**CHEMICAL POISONING SMELL SPRAYED INSIDE GUEST ROOM #1505 HAS A SWEET DEADLY SMELL!!!**

Someone allegedly sprayed carbon tetrachloride inside Guest Room #1505 because it had a very sweet smell and gave me a severe migraine headache.

To cover up the crime several Guests were assigned to nearby Guest Rooms.

-----Original Message-----

From: [doraadkins7@aol.com](mailto:doraadkins7@aol.com)  
To: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>  
Cc: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>  
Sent: Wed, Nov 11, 2020 8:22 am  
Subject: Fwd: EMAIL TO SELF REGARDING CHEMICAL  
POISONING SPRAYED INSIDE GUEST ROOM #1505 AT THE  
HYATT REGENCY HOTEL LOCATED IN RESTON, VA

**CHEMICAL POISONING SMELL SPRAYED INSIDE GUEST  
ROOM #1505 HAS A SWEET DEADLY SMELL!!!**

-----Original Message-----

From: [doraadkins7@aol.com](mailto:doraadkins7@aol.com)  
To: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>  
Cc: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>  
Sent: Wed, Nov 11, 2020 8:17 am  
Subject: EMAIL TO SELF REGARDING CHEMICAL POISONING  
SPRAYED INSIDE GUEST ROOM #1505

**EMAIL TO SELF REGARDING CHEMICAL POISONING  
SPRAYED INSIDE GUEST ROOM #1505 AT THE HYATT  
REGENCY HOTEL LOCATED IN RESTON, VA**

November 11, 2020

On November 10, 2020, after I returned from about 2-Hours of being out of Guest Room #1505 A CHEMICAL POISONING WAS SPRAYED INSIDE GUEST ROOM #1505. I became IMMEDIATELY GOT SICK with migraine headache, nausea and overall sickness. Something being sprayed inside Guest Room #1505 started on **Thursday, November 5, 2020** and I reported the incident to Rodney Brinson, Engineer for Hyatt Regency Hotel, located in Reston VA on Friday, November 6, 2020 when there was a made-up reason to enter Guest Room #1505 per a Notice received from Tyson Warren, General Manager on November 5, 2020. Guest Room #1505 filled the air with the sprayed substance.

WHEN WILL IT STOP! WHEN WILL IT STOP!

If I leave the Hyatt Regency Hotel, located in Reston VA, WHERE  
WILL I GO IN THIS COVID-A9 PANDEMIC!! WITH NO FUNDS  
TO DO ANYTHING INCLUDING EATING!!!

Guests have been switched in and out of the Guest Room directly  
beside Guest Room #1505 to prevent detection of where the  
CHEMICAL POISONING IS COMING FROM. The Housekeeper is  
called to clean the Guest Room to prevent detection of where the  
CHEMICAL POISONING IS COMING FROM.

Sincerely,

Dora Adkins

ADDENDUM

COMPENSATORY DAMAGES:

1. "In accord with the foregoing, Plaintiff claim damages against Defendant as follows:"

A. Compensatory Damages: TOTAL = Approximately \$13,000,000 (NOT INCLUDED):

(i) "Cost for Medicine for Brian Injury approximately \$6.00

Note: The Plaintiff reserves the right to amend the compensatory (which was not added in) and the amounts for Breach of Contract; Intentional Infliction of Emotional Distress; and for Punitive Damages as a *Prima Facie* Case.

B. DAMAGES: SIX MILLION DOLLARS for:

Count #1: Breach of Contract; Count #2: Intentional Infliction of Emotional

Distress; Claim: and Punitive Damages.




Damages - means the amount of compensation the Plaintiff is seeking in this lawsuit Count #1: Breach of Contract; Count #2; Tort of Intentional Infliction of Emotional Distress; and a Claim for Punitive Damages as a *Prima Facie* Case.

JURY DEMANDED

2. Trial by jury is demanded.

WHEREFORE, Plaintiff demands judgment against the Defendant, Hyatt Corporation in the TOTAL amount of SIX HUNDRED MILLION DOLLARS for Breach of Contract – 200 MILLION; Intentional Infliction of Emotional Distress – 200 MILLION; Punitive Damages – 200-MILLION; Claim for Punitive Damages- 200-Million as a *Prima Facie* Case and/or whatever else the Court deem appropriate.

Respectfully Yours,



Dora L. Adkins, *pro se*

Dora L. Adkins  
P.O. Box 3825  
Merrifield, Virginia 22116  
DoraAdkins7@aol.com  
No Telephone

Note: There is no way to contact the Plaintiff; except, by U.S. Mail to the above address because there is no working telephone number(s) to provide.

HYATT CORPORATION  
Registered Agent/Registered Office  
100 Shockoe Slip Fl 2  
Richmond, VA, 23219 - 4100, USA

PHYSICAL ADDRESS OF HOTEL:

Hyatt Regency Reston  
1800 Presidents Street  
Reston, VA 22190  
Phone: (703) 709-1234  
Fax: 703-295-8295

CERTIFICATE OF SERVICE:

I certify that on December 9, 2020 I filed an ["Amended Complaint"](#) along with all Exhibits and Emails as it relates to the Defendant, Hyatt Corporation.

Respectfully Yours,

A handwritten signature in cursive script, appearing to read "Dora L. Adkins".

Dora L. Adkins, *pro se*

EXHIBITS:

EXHIBIT #1: See, Copy of Business Entity Details for Hyatt Corporation, Proof of Diversity

EXHIBIT #2: See, Copy of Reservations made on August 18, 2020 through Present at the Hyatt Regency Reston Hotel

EXHIBIT #3: See, Notice Received from Tyson Warren, General Manager for Hyatt Regency Reston Hotel, Dated, November 5, 2020

EXHIBIT #4: See, Copy of Receipt for Excedrin for Tension; and the Name of CVS Pharmacist who Plaintiff Consulted with Regarding the Head Pain on December 5, 2020

EXHIBIT #5: See, Copy of Reservations made on December 5, 2020, at the Hilton located in Old Town Alexandria

EMAILS:

EMAIL #1: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 11, 2020

EMAIL #2: See, Other Emails Sent to Self-Regarding the Something Being Sprayed Inside Guest Room #1505, Dated, November 6, 2020

EMAIL #3: See, Email Sent to Self-Regarding the Chemical Spayed Inside Guest Room #1505, Dated, November 15, 2020

EMAIL #4: See, Copy of Email Plaintiff Sent to Self-Regarding a Very Offensive Smell Coming from a Nearby Guest Room to 1505

EMAIL #5: See, Copy of Email Plaintiff Sent to Self-Regarding the Fumes in Guest Room #726

EMAIL #6: See, Copy of Email Plaintiff Sent to GM for Hilton and a Second Email to Self-Regarding Plaintiff's Request for Reward Points Redemption Because of Fumes Inside a Purchased Guest Room at the Hilton



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

DORA L. ADKINS,

Plaintiff,

v. Civil Action No.: 1:20-cv-1410-AJT-MSN

HYATT CORPORATION,

Defendant.

**CERTIFICATION**

I declare under penalty of perjury that:

No attorney has prepared or assisted in the preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

Executed on December 9, 2020 (Date)

**OR**

Dora L. Adkins

(Name of Attorney)

No Telephone Number

(Telephone Number of Attorney)

Prepared or assisted in preparation of this document.

Dora L. Adkins

Name of Pro Se Party (Print or Type)

A handwritten signature in cursive script, appearing to read "Dora L. Adkins", is written over a solid horizontal line.

Signature of Pro Se Party (Print or Type)

Executed on December 9, 2020 (Date)



## Store Information

CVS Pharmacy Information	
Store Number	01383
Pharmacist-In-Charge	MARK LUNDBLAD
Phone Number	(703) 256-4030
Fax Number	(703) 916-8945
Address	7205 LITTLE RIVER TURNPIKE ...
City	ANNANDALE
State	VA
Zip	22003
DEA#	AP2493156
NABP#	4801040
NPI#	1750485413
State Medicaid Id#	1750485413
Federal Tax Id#	203649917
State Tax Id#	No Data Available

Ex. #4

Ex. #4

7205 LITTLE RIVER TURNPIKE, ANNANDALE, VA  
PHARMACY: 256-4030 STORE: 354-7062

REG#18 TRN#6452 CSHR#0000098 STR#1383

ExtraCare Card #: \*\*\*\*\*

F 1 EXCDRN TEN HA CPLT 24CT 7.49N

Survey ID #  
9275 1906 9855 462 01

TOTAL 7.49  
DEBIT 7.49

\*\*\*\*\* CH \*\*\*\*\*6191

US DEBIT  
REF# 184523  
TRAN TYPE: SALE  
TC: 5D4A98885B3598EB  
PIN VERIFIED ONLINE  
TVR(95): 8080048000  
AID: A0000000980840  
TERMINAL# 84205522  
CVM: 420000  
TSI(9B): 6800

CHANGE .00



3501 3830 3406 4521 82  
Returns with receipt, subject to  
CVS Return Policy, thru 02/03/2021  
Refund amount is based on price  
after all coupons and discounts.

DECEMBER 5, 2020 1:17 PM

=FLEXIBLE SPENDING ACCT SUMMARY (FSA)  
Health Care Eligible Total 7.49

\*\*\*\*\*  
FSA summary above includes items  
(and tax) that may be eligible for plan



ALEXANDRIA OLD TOWN

NAME AND ADDRESS:

ADKINS, DORA

PO BOX 3825

MERRIFIELD VA 22116  
UNITED STATES OF AMERICA

HILTON ALEXANDRIA OLD TOWN

1767 King Street | Alexandria, VA | 22314

T: 703 837 0440 | F: 703 837 0454

W: hiltonalexandria.com

Room: 726/K1D  
Arrival Date: 12/5/2020 6 55 00 PM  
Departure Date: 12/12/2020Adult/Child: 1/0  
Room Rate: 0.00Rate Plan: HHNSRH  
HH #:   
AL:   
Car:

Confirmation Number 3137468480

12/6/2020

Hilton

DATE	REFERENCE	DESCRIPTION	AMOUNT
12/5/2020	4925556	SELF PARKING	\$20.00
		**BALANCE**	\$20.00

W  
WALDORF  
ASTORIA  
HOTELS & RESORTS

CONRAD

canopy

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HOTELSEMBASSY  
SUITES  
BY HILTONHilton  
Garden  
InnHampton  
by Hiltontru  
by HiltonHOMESWOOD  
SUITES  
HOTELSHOME2  
HOTELSHilton  
Grand Vacations

DATE OF CHARGE FOLIO NO./CHECK NO.

853737 A

REMARKS &amp; SERVICES

TAXES

TIPS &amp; MISC

TOTAL AMOUNT

PAYMENT DUE UPON RECEIPT



**EMAIL TO SELF REGARDING A VERY OFFENSIVE SMELL COMING FROM A NEARBY GUEST ROOM TO INSIDE GUEST ROOM #1505**

**From:** doraadkins7@aol.com  
**To:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>  
**Cc:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>  
**Date:** Sat, Dec 5, 2020 11:18 pm

**EMAIL TO SELF REGARDING A VERY OFFENSIVE SMELL COMING FROM A NEARBY GUEST ROOM TO INSIDE GUEST ROOM #1505**

December 5, 2020

On Thursday, December 3, 2020, at approximately 8:30 p.m. and/or after I had gone to bed I heard Guests arriving nearby to Guest Room #1505. At the exact same time a very offensive smell got inside Guest Room #1505 as if it had been sprayed inside Guest Room #1505. It was very offensive. I awoken with a headache and/or head pain which was what I thought, but it lasted until Saturday, December 5, 2020. The Housekeeper came early on Friday, December 4, 2020 to clean the Guest Room directly beside Guest Room #1505 but the offensive smell was left behind as though she had not cleaned the Guest Room. To protect my Health, I try not to go outside of Guest Room #1505 while other surrounding Guest Rooms are opened and cleaned. HOW COULD THAT SMELL COMING OUT OF THAT GUEST ROOM NOT BE CLEANED BY THE HOUSEKEEPER AND/OR REPORTED TO MANAGEMENT. BECAUSE DIRECTLY AFTER THE GUEST ROOM HAD BEEN CLEANED BY THE HOUSEKEEPER THE SMELL REMAINED EVEN INTO THE HALLWAY.

About 10-15 minutes after the Guest Room was cleaned by the Housekeeper I went out to take out used linens from Guest Room #1505 and get clean ones and a different Housekeeper was cleaning a nearby Guest Room and I asked her if she smelled the offensive smell which she claimed not to smell anything.

On Friday, December 4, 2020, I was away from the Hyatt Regency Hotel for approximately 4-5 hours; no sooner than I arrived back the offensive smell invaded Guest Room #1505. I couldn't sleep for the head pain I started suffering and/or worsening from Thursday, December 3, 2020. When I left the Hyatt Regency Hotel using the steps; I heard someone coming from the 15th floor and I immediately left the stairwells and used the elevator in FEAR Someone was following me from that VERY OFFENSIVE GUEST ROOM.

On Saturday, December 5, 2020, I left the Hyatt Regency Hotel in an attempt to figure out what I should do. I went to CVS located in Annandale, VA and asked through a consultation with a CVS pharmacist what I should take for an unknown substance causing head pain. The CVS pharmacist recommended drinking lots of water and bed rest because he stated no medicine would relieve head pain caused by inhaling a substance.

I LEFT THE HYATT REGENCY HOTEL ON SATURDAY, DECEMBER 5, 2020 LOCATED IN RESTON, VA AND CHECKED INTO THE HILTON HOTEL LOCATED IN OLD TOWN ALEXANDRIA, VA. AS I WAS GETTING MY THINGS THAT I NEEDED FROM GUEST ROOM #1505 THE SMELL CAME BACK INSIDE GUEST ROOM #1505.

Sincerely,

Dora Adkins



**Fwd: EMAIL REGARDING FUMES INSIDE GUEST ROOM #726 LOCATED IN OLD TOWN ALEXANDRIA, VA**

**From:** doraadkins7@aol.com

**To:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>

**Cc:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>

**Date:** Tue, Dec 8, 2020 3:23 pm

EMAIL REGARDING FUMES INSIDE GUEST ROOM #726 LOCATED IN OLD TOWN ALEXANDRIA, VA

-----Original Message-----

From: [doraadkins7@aol.com](mailto:doraadkins7@aol.com)

To: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>

Cc: [DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com) <[DoraAdkins7@aol.com](mailto:DoraAdkins7@aol.com)>

Sent: Tue, Dec 8, 2020 3:21 pm

Subject: EMAIL REGARDING FUMES INSIDE GUEST ROOM #726 LOCATED IN OLD TOWN ALEXANDRIA, VA

**EMAIL REGARDING FUMES INSIDE GUEST ROOM #726 LOCATED IN OLD TOWN ALEXANDRIA, VA**

December 8, 2020

On Saturday, December 5, 2020 after making a reservation at the Hilton Old Town Alexandria, VA, I arrived and was provided Guest Room #726 that had strong fumes upon my opening the door to Guest Room #726. I SHOULD HAVE RETURNED TO THE FRONT DESK FOR HILTON AND REQUESTED ANOTHER GUEST ROOM. The night was extremely painful because of the fumes, noisy air condition, and I had to sleep on covering that may not have been properly changed and washed. I can't sleep under a blanket that other Guest used and/or a pillow that had not had it pillow case covering changed and washed; so I have to take everything off the bed and use ONLY sheets that know have been washed in hot water and cover the pillow with multiple coverings.

The shower curtain is not usually changed out and need to be taken down as well.

On Sunday, December 6, 2020, I reported the problems of freshly smell of fumes inside Guest Room #726 but Jarred, Front Desk Manager pretended to not know that fumes could be inside a Guest Room but was aware that the air condition sometimes have nose. I reported to Jarred, Front Desk Manager that I have gone to CVS and purchased air (condition) to get the awful smell out of Guest Room #726. I requested points to be rewarded back to me for sleeping in a Guest Room that had fumes in it. Jarred stated that he did not have authority, so I asked for the GM's email address, it was not the correct email address, but I called back TO Jarred and asked for the correct email. I sent and email but no reply from the GM as of Tuesday, December 8, 2020 and it was a stupid request anyway because I NEED TO CHECK OUT OF THE HOTEL.

*freshener*

I AM SO SICK OF BEING FOOD POSIONED AND/OR CHEMICALLY POSIONED.

Sincerely,

Dora Adkins

*Email #5*

**FUME-LIKE SMELL INSIDE GUEST ROOM #726 UPON CHECK-IN****From:** doraadkins7@aol.com**To:** John.OSullivan@Hilton.com <John.OSullivan@Hilton.com>**Cc:** DoraAdkins7@aol.com <DoraAdkins7@aol.com>**Date:** Sun, Dec 6, 2020 9:31 pm

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December 6, 2020

Dear Mr. Sullivan:

This email is being sent to you to request some complimentary points for the inconvenience of checking into Guest Room #726 on December 5, 2020 that had a fume-like smell and did not dissipate until late afternoon on Sunday, December 6, 2020 and/or after I purchased a plug in air fresher into the wall of Guest Room #726. The air condition in Guest Room #726 was also very noseey that interfered with my sleep.

Sincerely,

Dora Adkins

